



SERVICE EMPLOYEES
INTERNATIONAL UNION
AFL-CIO, CLC

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Online at:
www.seiu32bj.org

Local 32BJ Headquarters
101 Avenue of the Americas
New York, NY 10013-1906
212.388.3808

September 24, 2004

Via Fax (212-805-6191)
Hon. Barbara S. Jones
United States District Court
Southern District of New York
40 Centre Street, Room 2103
New York, New York 10007-1581

COUNSEL FOR PLTFF(S):

COUNSEL FOR DFT(S):

PLTFF PRO SE:

DFT. PRO SE:

DATE: 9/24/04

BY: [Signature]

SEP 24 2004

Re: Ghilduta v. Trump Tower et al., 04-CV-7494 (BSJ)

Dear Judge Jones:

This office represents Michael P. Fishman, as President of Local 32B-32J, Service Employees International Union, AFL-CIO ("Local 32BJ" or "Union"), one of the defendants in the above action.

Local 32BJ writes to respectfully request a 30-day extension of time within which defendants must answer or otherwise respond to plaintiff's complaint.

Plaintiff filed this hybrid Section 301/Duty of Fair Representation action in state court, alleging that his employer, the Trump Corporation, violated the collective bargaining agreement by firing him, and that his union, Local 32BJ, breached its duty of fair representation by inadequately representing him in his discharge arbitration. The arbitrator's award has not yet issued.

Defendants removed the action to this Court on September 21, 2004. Defendants must answer or otherwise respond by September 28. No previous extensions have been requested. Plaintiff consents to defendants' request for the extension.

Thank you for your consideration.

Sincerely,

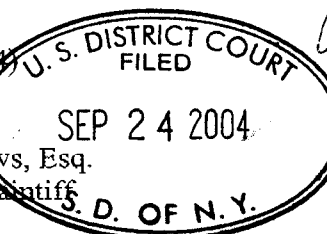
Kathleen Locke

Kathleen Locke, Esq. (KL 3724)
Associate General Counsel

cc via fax:

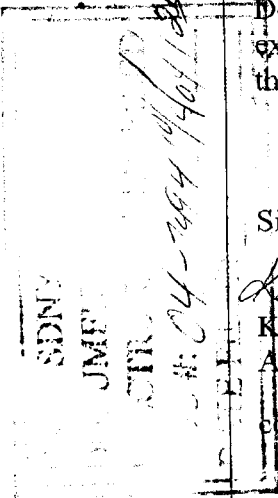
Michael Barrows, Esq.
Attorney for Plaintiff

Lawrence Rosen, Esq.
Attorney for Defendant Trump Corp.



Application is granted
So ordered
Barbara S. Jones
9/24/04

MICROFILM -9:00AM SEP 27 2004



Office of the General Counsel

SEIU Local 32BJ
101 Avenue of the Americas
19th Floor
New York, NY 10013-1906
Fax: 212.388.2062

